

SCHIFFRIN BARROWAY TOPAZ & KESSLER, LLP

Alan R. Plutzik, Of Counsel (Bar No. 077785)

Robert M. Bramson, Of Counsel (Bar No. 102006)

2125 Oak Grove Road, Suite 120

Walnut Creek, California 94598

Telephone: (925) 945-0770

Facsimile: (925) 945-8792

-and-

Sean M. Handler

Ian D. Berg

280 King of Prussia Road

Radnor, PA 19087

Telephone: (610) 667-7706

Facsimile: (610) 667-7056

[Proposed] Local Counsel

[Additional Counsel on Signature Page]

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

JOEL EICHENHOLTZ, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6140 MHP

CLASS ACTION

NOTICE OF MOTION AND MOTION OF  
THE ARKANSAS PUBLIC EMPLOYEES'  
RETIREMENT SYSTEM FOR  
CONSOLIDATION, APPOINTMENT AS  
LEAD PLAINTIFF, AND APPROVAL OF  
SELECTION OF LEAD AND LOCAL  
COUNSEL

DATE: March 17, 2008

TIME: 2:00 p.m.

COURTROOM: 15

JUDGE: Hon. Marilyn H. Patel

[Captions Continued on Next Page]

MOTION OF THE ARKANSAS PUBLIC EMPLOYEES' RETIREMENT SYSTEM FOR  
CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION  
OF LEAD AND LOCAL COUNSEL  
CASE NO. C 07-06140-MHP

PETER LIEN, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6195 JSW

CLASS ACTION

DONALD CERINI, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6228 SC

CLASS ACTION

BRIAN VAUGHN, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6197 VRW

CLASS ACTION

[Captions Continued on Next Page]

ALBERT L. FELDMAN and ELENOR JEAN  
FELDMAN, Individually and On Behalf of All  
Others Similarly Situated,

Plaintiffs,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6128 MMC

CLASS ACTION

WESTEND CAPITAL MANAGEMENT LLC,  
Individually and On Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6237 MMC

CLASS ACTION

KURT HILL, on behalf of himself and all others  
similarly situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6238 MHP

CLASS ACTION

[Captions Continued on Next Page]

DANIEL OFFUTT, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 07-6241 JSW

CLASS ACTION

EDWARD FEITEL, on behalf of himself and all  
others similarly situated,

Plaintiff,

v.

VERIFONE HOLDINGS, INC., DOUGLAS G.  
BERGERON, and BARRY ZWARENSTEIN,

Defendants.

No. C 08-0118 CW

CLASS ACTION

1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on March 15, 2008, at 2:00 p.m., or as soon thereafter as  
 3 the matter can be heard, in Courtroom 15 of the above-entitled Court, located at 450 Golden Gate  
 4 Avenue, San Francisco, California, before the Honorable Marilyn Hall Patel, United States  
 5 District Judge, the Arkansas Public Employees' Retirement System ("Movant") will move, and  
 6 hereby does move, this Court, pursuant to the Private Securities Litigation Reform Act of 1995  
 7 (the "PSLRA"), for an Order:

- 8 1. Consolidating for all purposes the above-captioned related actions in the
- 9 Northern District of California, as well as any other unknown related
- 10 actions;
- 11 2. Appointing Movant as Lead Plaintiff in the consolidated action; and
- 12 3. Approving Movant's selection of the law firm of Nix, Patterson & Roach,
- 13 L.L.P. to serve as Lead Counsel and the law firm of Schiffrin Barroway
- 14 Topaz & Kessler, LLP to serve as Local Counsel.

15 This Motion is supported by the accompanying Memorandum of Law, the accompanying  
 16 Declaration of Alan R. Plutzik and the exhibit annexed thereto, all of the prior pleadings and  
 17 proceedings had herein, and such other written and/or oral argument as may be presented to the  
 18 Court.

19 Dated: February 4, 2008

Respectfully submitted,

SCHIFFRIN BARROWAY  
 TOPAZ & KESSLER, LLP

s/Alan R. Plutzik

Alan R. Plutzik, Of Counsel  
 Robert M. Bramson, Of Counsel  
 2125 Oak Grove Blvd., Suite 120  
 Walnut Creek, CA 94598  
 Telephone: (925) 945-0770  
 Facsimile: (925) 945-8792

-and-

Sean M. Handler  
 Ian D. Berg  
 280 King of Prussia Road

Radnor, PA 19087  
Telephone: (610) 667-7706  
Facsimile: (610) 667-7056

[Proposed] Local Counsel

NIX, PATTERSON & ROACH, L.L.P.  
Bradley E. Beckworth  
Jeffrey J. Angelovich  
Susan Whatley  
Brad E. Seidel  
205 Linda Drive  
Daingerfield, TX 75638  
Telephone: (903) 645-7333  
Facsimile: (903) 645-4415

[Proposed Lead Counsel]

KEIL & GOODSON, PA  
Matt C. Keil  
John W. Goodson  
611 Pecan Street  
Texarkana, AR 71854  
Telephone: 870-772-4113  
Facsimile: 870-773-2967

Additional Counsel for Arkansas Public  
Employees' Retirement System